

CALLAGHAN THOMPSON & THOMPSON, P.A.

William A. Thompson, III, Esq.

2428 Atlantic Avenue

Atlantic City, NJ 08401

(609) 348-5300

ID #027851985

Attorney for Defendants Skyline Condominium Association
and Thompson Realty Company

FILED

JEANNE A. NAUGHTON, CLERK

APR 24 2017

U.S. BANKRUPTCY COURT
CAMDEN, N.J.

BY DEPUTY

In Re:

FRANCES HAQUE

Debtor

FRANCES HAQUE

Plaintiff,

vs.

SKYLINE CONDOMINIUM ASSOCIATION,
THOMPSON REALTY COMPANY;
CALLAGHAN, THOMPSON & THOMPSON,
PA and WILLIAM A. THOMPSON, III,
ESQUIRE

Defendant,

Case No.: 13-36691-ABA

Chapter 7

Adversary No.: 17-01117-ABA

**CERTIFICATION IN OPPOSITION
TO MOTION**

William A. Thompson, III, located at 2428 Atlantic Avenue, Atlantic City, New Jersey 08401 states and says:

1. I am the attorney for defendants Skyline Condominium Association and Thompson Realty Company in the above captioned matter.
2. Both defendants have been made aware of a potential conflict with my representation, and have signed written waivers consenting to my representation in this matter.
3. A review of plaintiff's complaint indicates that the complaint is based on two State Court complaints filed by Callaghan, Thompson and Thompson through attorney

William A. Thompson, III against the plaintiff. There are no other independent or separate claims contained in the initial complaint.

4. It should therefore be clear from the complaint that the basis of any potential claims that the plaintiff may have is solely the Court complaints filed by Callaghan, Thompson and Thompson.

5. In further support of that position, both defendants, Skyline and Thompson Realty have filed answers indicating that they do not control or direct the law firm as to what to include or exclude from complaints filed in their name. Therefore, both in the initial complaint and on the record in the answers of the defendants there is clearly no conflict between the defendants Skyline Condominium Association or Thompson Realty, and William A. Thompson, III or the law firm Callaghan, Thompson and Thompson.

6. Plaintiff alleges in the motion papers that the cause of action against all of the defendants is for violation of the Court's discharge order. There is no conflict on that count since the allegation of the violation is simply the State Court complaint. The moving papers then indicate that it seeks injunctive relief against Skyline. Plaintiff's counsel is well aware that injunctive relief is not required as Skyline, once again through its counsel, William A. Thompson, III, has indicated that no further action will be taken with regard to pre-petition debts. Finally, the moving papers indicate a cause of action against Thompson Realty for violation of the Fair Debt Collection Practices Act. Once again, there is no conflict there, since any violation, if there is any, would be based on the State Court complaint, but Thompson Realty is not subject to the Fair Debt Collection Practices Act because it is an alter-ego of Skyline Condominium, and therefore exempt from the Act.

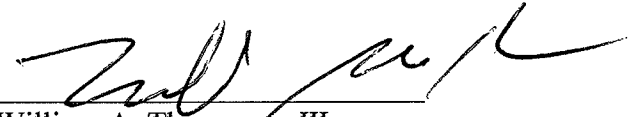
7. The fact that William A. Thompson, III may possibly be a witness in the adversary proceeding in matters unrelated to their defense does not affect the ability of

defendants Thompson Realty Company and Skyline Condominium Association to be represented by the counsel of their choosing.

I certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

4/21/17


William A. Thompson, III
Attorney for Skyline Condominium
Association and Thompson Realty